

**REMARKS**

By this amendment, claims 26-29 have been added for examination. Therefore, on entering this amendment, claims 14-29 are all the claims pending in the application.

Claims 14, 19 and 21 are objected to because these claims are very difficult to understand due to the use of confusing language.

Claims 14-17, 19 and 21-24 are rejected under 35 U.S.C. 102(b) as being anticipated by Chang, "Data Resource Selection in Distributed Visual Information Systems", I.E.E.E. Knowledge and Data Engineering, Volume 10, pages: 926-946, November 1998.

Claims 18, 20 and 25 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form.

The Applicants traverse the rejections and request reconsideration.

***Response to Amendment and Arguments and Claim Objections***

The patent office maintains the rejection of the claims on essentially the same grounds. Specifically, the patent office notes that Chang suggest automatic computing. Further, the patent office contends that the additional limitation related to "automatically determining...without input from the user" is difficult to understand.

The Applicants respectfully submit that a skilled artisan would know that the textual dissimilarity is determined completely by the computer without any input from the user. Specifically, each of the steps in Fig. 2, namely steps 202, 204, 206 and 208 are performed by the computer without requiring any additional input from the user. This is further described in

pages 6-8 of the Specification. As can be seen, none of the steps require an intervention from the user.

Claim 14 has been amended to clarify further that the computation of the textual dissimilarity does not require any input from a user.

***Claim rejections based on 35 U.S.C. § 102***

**Rejection of claims 14-17, 19 and 21-24 under 35 U.S.C. 102(b) based on Chang**

The patent office continues to ignore the above-discussed limitation related to determining dissimilarity without requiring any intervention from the user. The patent office incorrectly contends that Chang suggest automatic computation. However, Chang requires user input. The computation is not completely automatic as in the present invention. It requires human intervention as noted in p. 938, 1<sup>st</sup> paragraph, 1<sup>st</sup> column.

Chang does not disclose the process calculating “perceptual similarity” as in the present invention. The process described on page 938 of Chang cannot be used for calculating “perceptual similarity”. That process only calculates statistical similarity and then determines weight based on the human perception.

As shown in the exemplary embodiment of Fig. 3, the present invention uses “statistical descriptor” and “perceptual descriptor” respectively to calculate “statistical similarity” and “perceptual similarity.”

The present invention determines dissimilarity without requiring any intervention from the user. On the other hand Chang requires user input. Therefore, Chang does not disclose that the computation is completely automatic as in the present invention.

Claims 15-17, 19 and 21-24 depend on claim 14, and therefore, are allowable for the same reasons.

***New Claims***

New claims 26-29 have been added for examination.


***Allowable subject matter***

The patent office is requested to hold the status of the allowable claims in abeyance pending resolution of the status of the base claims.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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